

EXHIBIT A

Pro Se Intake Unit
 U.S. District Court, Southern District of New York
 500 Pearl Street
 New York, NY 10007

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S.D. OF N.Y.

Mariah Lopez

Write the full name of each plaintiff or petitioner.

Case No. 17 cv 03014

New York City -against-
Department of Homeless
Services

Write the full name of each defendant or respondent.

Letter re: Emergency request
for TRO,

Dear Judge

① I am writing the Court to make you aware of the fact that DHS has placed me at facilities which cannot reasonably accommodate my medical disabilities, PTSD and Gender Identity Disorder. ② I believe the decision for DHS to move me from Marsha's was retaliatory and DHS refusal to temporarily place me back at Marsha's is a failure to make "reasonable"

6/15/17

Dated

Signature

Mariah Lopez

Name

Prison Identification # (If Incarcerated)

Homeless

Address

City

State

Zip Code

212 470 9689

Telephone Number (if available)

mariah4change@gmail.com

E-mail Address (if available)

accommodations for my disabilities. ³ The refusal by DHS to place me at the only facility that can provide the accommodations I need is motivated by caprice and the desire to silence my whistle blowing at Marsha's House. ⁴ ALL staff and administration who supported my transfer face dismissal from their jobs if my allegations pan out; this creates a clear conflict of interest by the parties accusing me of misconduct at Marsha's.

⁵ The fact that DHS has denied me an administrative review, by someone outside of conflicted parties (ie Mr Paul Hagrow, or Kaedon Brinnell) is evidence of DHS mechanizations to silence my valid concerns with my treatment at and transfer from Marsha's.

⁶ None of the allegations against me have been substantiated in court or via any type of formal hearing.

⁷ Since May 31st I have faced considerable psychological distress and crisis because I am homeless again.

⁸ The shelter "WIN West" is not a reasonable accommodation since

the facility directly causes triggers painful symptoms of my PTSD

- (9) - ALL other DHS facilities besides Marsha's are also not 'reasonable accommodations' for my PTSD or GID since being forced to "hide" my trans-identity, and needs, also triggers my conditions and their symptoms.
- (10) - Since May 31st I have almost had a nervous 'break down' and have needed emergency psych treatment at Mount Sinai Emergency Department. (6/9/17)
- (11) - My Service Animal is starting to exhibit behavioral issues because of the instability in my life. ⁽¹²⁾ I'm concerned that my animal's usefulness as a Service Animal will be negatively impacted if I am not allowed to return to Marsha's
- (13) - I'm concerned that I will be hurt or hurt someone else, if I am not provided a reasonable accommodation

by DHS, in the form of me being transferred back to Marsha's while DHS and I work on permanent housing. ¹⁴ My doing sex work is not an option. Since I am obligated to care for my animal, ¹⁵ if I don't engage in sex work, I would have no way to house/board my animal. ¹⁶ Going to WIN West with my animal — or any other DHS facility besides Marsha's would trigger my PTSD and exhaust my animal's abilities to provide relief for my ~~symptoms~~ ^{me} symptoms via her training.

¹⁷ My dog would never get to rest!

¹⁸ - my history of PTSD and identity as a transsexual/transgender woman is well documented

¹⁹ - I have been working as hard as I can to secure permanent housing. ²⁰ I believe I stand to suffer worse irreparable harm and injuries if my PTSD gets worse due to being homeless or having to engage in sex work.

²¹ - DHS decision to "force" me into a "female" facility is a violation of New York City and State law. → continued

which prones my traumatic history near
WIN West

- (22) Two copies of psych evals by two
experts, from when I was in care, ~~and~~ (m) ~~and~~
proving my history of PTSD and GID

(23) - Excerpt from "Joel A" Federal Complaints
which also provides proof of history of
trauma, and New York's history of needing
to drastically improve services and the
number of beds for ~~and~~ BLBTQ individuals,
especially youth and homeless persons.

(24) - Letter from Anthony Sgarlato Program Manager
at Baltic Street A&H, which attests to my
efforts to find permanent housing

(25) - Letter from my retired physician referring
to me as "Transsexual" proving the need
for me to identify as such without fear of
harassment (which DHS cannot guarantee at
non GLBTQ facilities).

(26) - Letter from my current psychiatrist,
Dr Priere Arty recommending I be placed
back at Marsha's House

- (27) - New York Law prohibits DHS from labeling someone as "female" or "male" in order to house them. New Yorkers get to choose "Transgender/Transsexual" as an option.
- (28) - New York law also considers GID (Gender Identity Disorder) to be a disability because of a lawsuit which I won as a teen, "Jean Doe v Bell".
- (29) - DHS refusal to block Project Renewals request to transfer me from Marsha's house was a violation of my rights to be "reasonably accommodated" under local, state and federal law. ³¹ Demanding Project Renewal staff prove their allegations ~~while~~ while I'm still at Marsha's is not unreasonable. ³² DHS' own fault that only one GLBTQ facility exists where trans people can be safe and not experience environmental triggers.
- (33) - DHS has no facilities beside Marsha's which can accommodate my needs around vaginal dilation. ³⁴ I will suffer irreparable harm if I am not able to dilate according to my doctors orders.

(35)

on May 31st DHS vigorously argued, very specifically, to be allowed to place me at WIN West placing all their eggs in one proverbial basket.

(36)

Since my mental health providers disagree and have ~~not~~ ^{ML} supported my need to be placed back at Marsha's, I am asking the Court to issue a TRO ordering (the following)

- DHS to place me back at Marsha's until this Court reviews whether I will be harmed by a placement other than Marsha's

- DHS to reserve a bed at Marsha's until the conclusion of my ADA case in front of this court, ~~there~~ ^{ML} or until I have found permanent housing, since Marsha's is the only Trans Shelter which has single bed rooms

I am attaching the following exhibits to support my requests for a TRO (A-H) ^{ML}

~~1 - copy of Family Court Petition~~